

Environmental Protection Agency
Air Force Semi-Annual BRAC Report
October 1, 2014 – March 31, 2015

GRIFFISS AFB, NY

EPA RPM:	Bob Morse	212-637-4331	<i>morse.bob@epa.gov</i>
State RPM:	Heather Bishop	518-402-9692	<i>h1bishop@gw.dec.state.ny.us</i>
DoD BEC:	Dave Farnsworth	315-356-0810	<i>david.farnsworth@us.af.mil</i>

I. Significant Issues:

- a. Congressional: None
- b. High Profile Items: None
- c. Delays in Environmental Restoration Actions: None

II. Issues Impacting Transfer:

None. All Air Force property at the base intended for transfer has been transferred to outside parties.

III. Staffing/Funding Issues: None

IV. MOU Support Update:

EPA utilized the FTE funding provided by the Air Force to review remaining FOSTs and allow for transfer of the last remaining base property early in FY 2014. Also, under the Air Force's Performance Based Contract, additional work has been ongoing for the re-evaluation of former sites. These re-evaluations are to determine if unrestricted use determination can be made for sites at which remedies have been implemented and institutional controls had been required. EPA approved the removal of land use restrictions and/or sampling reductions at several sites based upon the Air Force's re-evaluation reports. EPA staff participation in previous RAB meetings has helped provide continued assurance to the public that the Air Force's cleanup program provides adequate protection of human health and the environment

PLATTSBURGH AIR FORCE BASE, NY

EPA RPM:	Bob Morse	212-637-4331	<i>morse.bob@epa.gov</i>
State RPM:	Dan Eaton	518-402-9620	<i>djeaton@gw.dec.state.ny.us</i>
DoD BEC:	Dave Farnsworth	518-563-2871	<i>david.farnsworth@us.af.mil</i>

I. Significant Issues:

a. Congressional: None

b. High Profile Items: None

c. Delays in Environmental Restoration Actions:

- Five-Year Review Report: The Report has not yet been received by EPA. With a deadline for signature of November 19, 2014, it is hoped that if the Air Force can submit the Report by mid-October.
- OU 7 (Site SS-004 Flightline): The draft PRAP for this OU has not yet been received from the Air Force.

II. Issues Impacting Transfer:

None. All Air Force property at the base intended for transfer has been transferred to outside parties.

III. Staffing/Funding Issues: None

IV. MOU Support Update:

EPA staff participated in regular calls with the Air Force, NYSDEC, and NYSDOH to help develop SVI protocols that proved acceptable to all parties involved, and a major ROD including SVI was signed at the end of the FY. EPA staff also participated in weekly calls and emails with the Air Force, NYSDEC, and NYSDOH to help enable the Air Force to complete a Remedial Action performed during the summer of 2014 almost a year ahead of schedule. EPA has played a major role in helping return Base property to the community for many years. The results of these efforts came to fruition at the end of FY12, as the last remaining property at the former Base was returned to the community by early transfer, and the Air Force was able to hold a whole base transfer ceremony prior to the end of FY 12. Under the Air Force's Performance Based Contract, the status of Sites where remedies have already been implemented is being re-evaluated. This includes the evaluation of possible sampling reductions or elimination, as well as the possible removal of LUC/ICs, while continuing to provide protection of human health and the environment. EPA was able to approve reductions in sampling at several sites. EPA staff participation in previous RAB meetings has helped provide continued assurance to the public that the Air Force's cleanup program provides adequate protection of human health and the environment.

McClellan AFB, CA - NPL

EPA RPMs: Bob Fitzgerald	(415) 947-4171	[HYPERLINK
"mailto:fitzgerald.bob@epa.gov"]		
Charnjit Bhullar	(415) 972-3960	[HYPERLINK
"mailto:bhullar.chnarnjit@epa.gov"]		
S.J. Chern	(415) 972-3268	[HYPERLINK "mailto:chern.shiann-jang@epa.gov"]
Kim Hoang	(415) 972-3147	hoang.kim@epa.gov
State RPMs: Stephen Pay	(916) 255-6403	[HYPERLINK "mailto:spay@dtsc.ca.gov"
]		
Franklin Mark	(916) 255-3584	[HYPERLINK
"mailto:franklin.mark@dtsc.ca.gov"]		
James Taylor	(916) 464-4669	[HYPERLINK
"mailto:jdtaylor@waterboards.ca.gov"]		
DoD BEC: Steven Mayer	(916) 643-0830 x224	[HYPERLINK
"mailto:steven.mayer@us.af.mil"]		
[HYPERLINK "mailto:Steve.Mayer@lackland.af.mil"]		

I. Significant Issues:

a. Congressional: None.

b. High Profile Items:

Focused Strategic Sites (FSS) RD/RA (Remedial Design and Remedial Action):

EPA provided comments to the Air Force (AF) to finalize the Consolidation Unit (CU) Remedial Action (RA) Completion Report, the Combined Cap (Confirmed Site (CS) 011 through CS 014 and Area of Concern (AOC) 313) RA Completion Report, the Vadose Zone RA Completion Report and the PRL (Potential Release Location) 008 cover design.

Follow-On Strategic Sites (FOSS) Record of Decision (ROD): EPA provided comments on the final FOSS ROD, leading to an FY14 completion of a large and complex decision document for 88 sites.

c. Delays in Environmental Restoration Actions:

Radiological Removal Actions:

Finding of Suitability for Early Transfer (FOSET) #1 (Delayed Sites, AOC (Area of Concern) 314 and S 30A): In late 2012 to early 2013, a non-time critical removal action was performed at Area of Concern (AOC) 314 and Potential Release Location (PRL) S-030A at the former base. Additional confirmation samples requested by the California Department of Public Health (CDPH) identified a need for additional removal actions at AOC 314.

II. Issues Impacting Transfer:

One final property transfer is underway. Issues that have, and will continue to, impact transfers are: (1) uncertainty about site characterization and sources, (2) potential/known radionuclide contamination and remediation, and (3) completion of required CERCLA documents.

Focused Strategic Sites (FSS):

Transfer of the FSS property will be difficult because rad waste will be left in place under caps or in the CU. Further discussions to determine how the California Department of Public Health (CDPH) licensing and license exemption requirements would apply, and to whom they would apply, will be needed. Furthermore, this transfer is expected to be additionally complex since the FSS property is likely to be transferred to four distinct parties.

Radiological Removal Actions:

The rad removal actions impact property transfers since the developer will not accept transfer with rad contamination. As mentioned above, additional removal actions have been recently completed at AOC 314. Four additional rad removal sites with larger than planned contaminated volumes will be addressed by the FOSS Remedial Design and Remedial Action (RD/RA) during a subsequent field season since the AF determined that it cannot complete the removals at those sites under its existing contracts. This will delay completion of these rad removals and will impact or delay the transfer of those sites.

III. Staffing/Funding Issues:

The reduction of McClellan BRAC funding and increase in BRAC work load will cause delays in EPA's response and/or complete or partial deferral to the State on some aspects of EPA's oversight work.

IV. MOU Support Updates:

EPA has assisted the AF by:

- Expediting review of documents to keep actions on schedule and facilitate property transfer.
- Performing construction oversight, including the operation of the CU; excavation of CS 022, CS 024, PRL 008, and the Small Arms Firing Range; and oversight of the Ecological Sites RA.
- Supporting issue resolution. EPA facilitated resolution of a large number of issues for the FSS RD/RA, FOSS ROD, rad removals, Ecological Sites RD/RA, and FYR (see above).
- Supporting the Air Force with the FYR process. EPA provided comments on the draft and draft final Five Year Review report. EPA also did extensive rewriting of most

of the Privatized Sites sections and participated in working sessions for the review of the sections. EPA concurred on the AF Part 1 of the FYR and signed Part 2 of the FYR, Privatized Sites, by the end of the reporting period.

McClellan AFB, CA – Privatization

EPA RPMs: Bob Fitzgerald (415) 947-4171 "mailto:fitzgerald.bob@epa.gov"] [HYPERLINK "mailto:bhullar.charnjit@epa.gov"] S.J. Chern (415) 972-3268 jang@epa.gov"]	[HYPERLINK Charnjit Bhullar (415) 972-3960 [HYPERLINK "mailto:chern.shiann- hoang.kim@epa.gov [HYPERLINK
Kim Hoang (415)-972-3147 State RPMs: Franklin Mark (916) 255-3584 "mailto:franklin.mark@dtsc.ca.gov"] James Taylor (916) 464-4669 "mailto:jdtaylor@waterboards.ca.gov"] DoD BEC: Steven Mayer (916) 643-0830x224 "mailto:steven.mayer@us.af.mil"]	 [HYPERLINK [HYPERLINK

I. Significant Issues:

- a. Congressional: None.
- b. High Profile Items:

FOSET # 3:

During the reporting period, EPA received, reviewed and commented on the pre-final and final Finding of Suitability for Early Transfer (FOSET) # 3 from the Air Force (AF). The document includes nine parcels, approximately 198 acres and 59 sites, which was a significant reduction from previous drafts since EPA and the State convinced the AF to transfer sites not requiring cleanup actions under a simpler process. EPA also completed the 4th Federal Facility Agreement amendment which allows the early transfer to occur. EPA issued a draft and draft final Administrative Order on Consent (AOC) and a draft final and final Statement of Work (SOW) which are required EPA documents to support FOSET # 3. EPA also completed a draft and draft final *Federal Register* Notice and a draft FOSET # 3 concurrence and covenant deferral letter to help expedite the transfer process after the AOC will be signed. The FOSET # 3 transfer is expected to be completed by early 2015.

- c. Delays in Environmental Restoration Actions: None.

II. Issues Impacting Transfer:

One final property transfer (FOSET # 3) is underway. Issues that have and continue to impact transfers are: (1) uncertainty regarding site characterization and sources, (2) how to address potential/known radionuclide contamination, and (3) completion of required Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) documents.

Focused Strategic Sites (FSS):

Transfer of the FSS property will be difficult since rad waste will be left in place under caps or in the Consolidation Unit (CU). Further discussions to determine how the California Department of Public Health (CDPH) licensing and license exemption requirements would apply, and to whom they would apply, will be needed. Furthermore, this transfer is expected to be additionally complex since the FSS property is likely to be transferred to four distinct parties.

III. Staffing/Funding Issues: None.

IV. MOU Support Updates:

EPA has assisted the AF and developer by:

- Reviewing and commenting on the pre-final and final FOSET # 3 document from the AF.
- Issuing a draft and draft final Administrative Order on Consent (AOC) and a draft final and final Statement of Work (SOW) to ensure that the required EPA enforcement documents are in place to support FOSET # 3.
- Developing, briefing its management and Office of Regional Counsel, and signing the 4th Federal Facility Agreement amendment, which allows the early transfer to occur.
- Completing a draft and draft final Federal Register Notice and a draft FOSET # 3 concurrence and covenant deferral letter to help expedite the transfer process after the AOC will be signed.
- Discussing and providing recommendations to the AF on how to structure the FOSET # 3 property transfer. Specifically, a) EPA suggested to the AF that FOSS sites with a No Further Action remedy in the FOSS ROD should be considered for expedited transfer as Finding of Suitability for Transfers (FOSTs), not as part of the larger FOSET # 3, and b) recommended improvements to the documentation of required Institutional Controls.
- Working with the developer, McClellan Business Park (MBP), to evaluate and clarify site characterization findings of future FOSET # 3 sites to assist with MBP's negotiations with the AF regarding cleanup requirements under this future property transfer.

[PAGE * MERGEFORMAT]

WILLIAMS AIR FORCE BASE, AZ

EPA RPM: Carolyn d'Almeida (415) 972-3150 [[HYPERLINK](mailto:dalmeida.carolyn@epa.gov)
"mailto:dalmeida.carolyn@epa.gov"]
State RPM: Wayne Miller (602) 771-4121 [[HYPERLINK](mailto:miller.wayne@azdeq.gov)
"mailto:miller.wayne@azdeq.gov"]
DoD BEC: Cathy Jerrard (315) 356-0810 ext. 204 [[HYPERLINK](mailto:catherine.jerrard@us.af.mil)
"mailto:catherine.jerrard@us.af.mil"]

I. Significant Issues:

- a. Congressional: No congressional issues to report at this time.
- b. High Profile Items: The Record of Decision Amendment (RODA) for the land fill (LF) 004 was signed in April 2014. The Remedial Design and Remedial Action (RD/RA) Workplans for both the storage tank (ST) Fuels Spill Steam Enhanced Extraction remedy and the LF004 In -Well Air Stripping and Soil Vapor Extraction remedy were completed, simultaneously with construction. The Air Force's consultant, AMEC, completed construction on both the ST12 Fuels Spill and LF004 remedies and initiated Soil Vapor Extraction at the Fire Training (FT) 002 area, achieving construction completion milestone by the end of FY 2014.
- c. Delays in Environmental Restoration Actions:
The Draft ROD (Record of Decision) for OU 6, old pesticide/paint shop was reviewed and discussed during this reporting period. The agencies concurred with the remedy as initially presented in the draft ROD. However, the ROD was not finalized due to the Air Force (AF) changing their position on institutional controls (ICs) after the draft ROD was submitted for agency review. The AF prepared a revised risk assessment to present a case for ICs not being necessary. The regulatory agencies have concerns that continued management of the site is warranted. The issues are being elevated for resolution.

The discovery of a few Chemical Agent Instruction Set (CAIS) mustard vials has delayed the Military Munitions Response Program (MMRP) investigation of the Parcel N Debris area, which was referred to the US Army Corps of Engineers (ACOE) for completion. ACOE has completed excavation of the of the debris pits, with the exception of glass shard from empty CAIS vials, no further CWA (chemical warfare agents) items were found.

II. Issues Impacting Transfer:

AF submitted documentation in support of a partial NPL (National Priorities List) deletion.

III. Staffing/Funding Issues:

AF's request for partial deletion from the NPL requires a substantial effort for EPA staff and management while the funding level provided for 2015 has been significantly reduced.

IV. MOU Support Update:

EPA completed reviews of RD/RA workplans for LF004 Landfill In -Well Air Stripping (IWAS) / Chemical Oxidation remedy and ST12 Fuels Spill Steam Enhanced Extraction (SEE) Remedy. Both remedies are constructed and operating; we are anticipating review of data as it becomes available.